

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA
PITTSBURGH DIVISION**

SEUBERT & ASSOCIATES, INC.,)
)
and)
)
TEAM TEN LLC, d/b/a AMERICAN EAGLE)
PAPERMILLS)
)
Plaintiffs)
)
v.)
)
THE AMBASSADOR GROUP LLC, d/b/a)
AMBASSADOR CAPTIVE SOLUTIONS)
)
and)
)
BRANDON WHITE)
)
Defendants.)

CASE NO. 2:20-cv-1880

AMBASSADOR’S NOTICE OF REMOVAL OF ACTION TO FEDERAL COURT

Defendants The Ambassador Group LLC and Brandon M. White (together, “Ambassador”) hereby remove to the United States District Court for the Western District of Pennsylvania, pursuant to 28 U.S.C. §§ 1332 and 1441, the action pending in the court of common pleas of Allegheny County, Pennsylvania (“State Court”) styled *Seubert & Associates, Inc., et al. v. The Ambassador Group LLC, et al.*, Case No. GD-20-011629 (Allegheny Ct. Common Pleas filed Nov. 10, 2020) (“State Court Action”). As cause for the removal of the State Court Action, Ambassador states as follows:

1. The State Court Action was filed by Plaintiffs Seubert & Associates, Inc. and Team Ten LLC (together, "Plaintiffs") with the State Court on November 10, 2020. True and correct copies of the original complaint ("Complaint") filed by Plaintiffs against Ambassador in the State Court Action, and of an affidavit confirming the service of the Complaint are attached hereto as Exhibit A.

2. The Ambassador Group LLC and Brandon M. White were served with copies of the Complaint by mail on November 14, 2020.

3. Plaintiffs in the Complaint are seeking compensatory damages on their claims against Ambassador in a total amount in excess of \$75,000. Plaintiffs' Complaint asserts seven (7) claims against Ambassador, including a claim for punitive damages. In each of Plaintiffs' first five (5) claims against Ambassador, Plaintiffs are seeking compensatory damages in an amount in excess of \$35,000. In count six (6) of the Complaint, Plaintiffs are seeking damages related to a claim of conversion in an amount in excess of \$50,000. In count seven (7) of the Complaint, Plaintiffs are seeking punitive damages.

4. The Court is the proper venue under 28 U.S.C. § 1441(a). The State Court Action was filed in Allegheny County, Pennsylvania, and the United States District Court for the Western District of Pennsylvania, Pittsburgh Division, is the United States District Court embracing the place where the State Court Action is pending.

5. The State Court Action is removable pursuant to 28 U.S.C. §§ 1332 and 1441 because the citizenship of the parties is completely diverse and the amount in controversy exceeds the jurisdictional requirement of the Court. The Ambassador Group LLC is a Kentucky limited liability company with its principal place of business in Louisville, Kentucky and with all of

its membership interest owned by Brandon M. White, a citizen and resident of Kentucky. Seubert & Associates, Inc. is a Pennsylvania corporation with its principal place of business in Pittsburgh, Pennsylvania. (Complaint, ¶ 1). Team Ten LLC is a Pennsylvania limited liability company with its principal place of business in Altoona, Pennsylvania. (Complaint, ¶ 2). Upon information and belief, and after reasonable investigation, no limited liability company member of Team Ten LLC is a resident of the Commonwealth of Kentucky.

6. Complete diversity of citizenship exists between the parties, as Plaintiffs and Ambassador are citizens of different states.

7. The Court, therefore, has original jurisdiction over Plaintiffs' claims pursuant to 28 U.S.C. § 1332 given the complete diversity of citizenship of the parties and the amount in controversy.

8. Pursuant to 28 U.S.C. § 1441(a), Ambassador is entitled to remove the State Court Action.

9. Pursuant to 28 U.S.C. § 1446(d), Ambassador will promptly provide written notice of the removal of the State Court Action to Plaintiffs, the only other parties to the State Court Action, and will file a copy of this notice with the clerk of the State Court.

10. This notice of removal is timely under 28 U.S.C. § 1446(b).

Respectfully submitted,

/s/ Brad S. Keeton

Brad S. Keeton (PA 315144)

Culver V. Halliday (*pro hac* to be filed)

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Attorneys for Defendants

The Ambassador Group LLC and

Brandon M. White

CERTIFICATE OF SERVICE

I certify that, on December 4, 2020, Ambassador's Notice Of Removal Of Action To Federal Court was electronically filed using the Court's CM/ECF System, and served by mailing copies by electronic mail and United States, first class postage prepaid, to the following:

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/s/ Brad S. Keeton

Attorney for Defendants

The Ambassador Group LLC and

Brandon M. White